UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA FT. PIERCE DIVISION

CASE NO. 23-80219-CR-CANNON

UNITED STATES OF AMERICA,)
Plaintiff,)
vs.)
MICHAEL GORDON DOUGLAS,)
Defendant.)
)

UNOPPOSED MOTION FOR LOCAL COUNSEL TO WITHDRAW

COMES NOW the Undersigned, John R. Howes, Esq. who as appeared in this matter as Local Counsel and pursuant to Local Rules 11.1(d) and 4(b) and respectfully requests that this Honorable Court enter its Order allowing the undersigned counsel to withdraw from this matter. As grounds in support of this Motion the Undersigned would state as follows:

1. During previous conversations with Assistant U.S. Attorney Gregory Schiller, he stated that the Government had no objection to the undersigned's withdrawal from this matter. Undersigned counsel has provided considerably more time and effort in insuring that lead counsel was informed of his requirements as

U.S. v. Michael Gordon Douglas, Case No. 23-80219-CR-Cannon Unopposed Motion for Local Counsel to 2 Withdraw

counsel of record, in filing requested pleadings with this Court and performing various other matters far beyond the normal duties of local counsel.

- 2. The Defendant and Lead Counsel do not oppose the Undersigned's withdrawal and all matters generally required by Local Counsel have been complied with.
- 3. The relationship between and among the defense camp have deteriorated to the point that it is not in the best interest of any in the defense camp for Undersigned to continue in this matter and particularly to be present during trial. The Undersigned would continue to provide for the filing of any documents under the CM/ECF system as needed.
- 4. While not privy to the details of the deterioration of the relationship between Lead Counsel and the Defendant, the undersigned has been advised that certain ethical issues have made it impossible for Undersigned to remain in this matter, due to the demands of the Defendant.

WHEREFORE, in light of the Undersigned having fulfill the obligations required under the Local Rules and with the Undersigned not being intimately involved in the preparation of the case for trial in this matter, it is respectfully requested that this Motion to Withdraw be granted.

John R. Howes, Esq.

John R. Howes, Esq.

U.S. v. Michael Gordon Douglas, Case No. 23-80219-CR-Cannon Unopposed Motion for Local Counsel to 3 Withdraw

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Motion of Local Counsel to Withdraw has been furnished by Electronic Delivery using CM/ECF and by email Schiller, Assistant United States Attorney Gregory Esq. to at Gregory.Schiller@usdoj.gov Kirby, and to John D. Esq. at jkirby@johnkirbylaw.com this 13th day of December, 2024.

John R. Howes, Esq.

John R. Howes, Esq.